

EXHIBIT 32

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

K.C., *et al.*,)
)
 Plaintiffs,)
)
 v.) No. 1:23-cv-00595-JPH-KMB
)
 THE INDIVIDUAL MEMBERS)
 OF THE MEDICAL LICENSING)
 BOARD OF INDIANA, in their)
 official capacities, *et al.*,)
)
 Defendants.)

DECLARATION OF YAACOV SHEINFELD

I, Yaakov Sheinfield, pursuant to the provisions of 28 U.S.C. § 1746, do hereby declare as follows:

1. I am over the age of 18 years and I have personal knowledge of the matters stated in my testimony.
2. My daughter, S.S. had been in counseling for depression since age 15 but had never said anything about gender dysphoria to her counselor.
3. At age 17, S.S.'s mother told me that S.S. was transgender. I did not think it was a good idea to pursue transitioning, nevertheless, I told S.S. that I would help her in any other way.
4. S.S. had suffered a lot of rejection in school and was seeking affirmation. Five of her friends announced that they were transgender. When S.S. said she was transgender too it was seen as fashionable, and she finally had the peer acceptance she had not previously experienced in high school.

5. When S.S. went to college at age 18, unbeknownst to me, she began taking testosterone. When I met with her at school, I noticed she was very depressed.

6. A social worker who was also present at my meeting with S.S., Shannon Sennott, told me that S.S. was going to get a double mastectomy.

7. When I objected to her taking such a drastic step at such a young age, the social worker told me I was an “Israeli chauvinist,” a typical chauvinist male, who doesn’t love his child enough. Her approach was that this is what we’re going to do and you need to just get on board.

8. The social worker assured me that everything would be fine if I just loved my daughter.

9. After this meeting, S.S. refused to talk to me and began threatening that she would kill herself if she did not get the surgery she wanted. She had a double mastectomy at age 19.

10. I witnessed distressing physical and emotional changes in S.S. The changes in her because of the testosterone were so distressing that I even considered suicide at one time. S.S. gained and lost lots of weight, had pain all over her body, suffered from mood swings, could not concentrate, and described herself at times as “barely alive.” At one point she was hospitalized in a psychiatric hospital for depression and suicidal thoughts.

11. S.S. was deeply depressed and taking a significant number of medications along with testosterone. It did not appear any medical professional was monitoring all these medications or even understood their possible interactions. I kept assuring her that I would do whatever I could to help her.

12. S.S.’s pain became so intense that she began taking Fentanyl.

13. S.S. was found dead on August 6, 2021, with Fentanyl and alcohol in her system. She was 28. S.S. had been identifying as a male and taking testosterone for ten years.

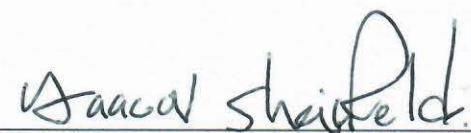
14. Indiana's law and similar laws that prohibit interventions that alter and harm minor children's bodies as a treatment for gender dysphoria are critically important. Young people, especially those with mental health issues, such as S.S., cannot make clear decisions about their future, particularly when neither they nor their parents are provided with full information about the effects of these interventions. We know from research that teenagers do not have fully formed brains, so even a healthy 18-year-old does not have the mental maturity to make life-altering decisions such as taking cross-sex hormones or having surgeries that will significantly alter their bodies and impact their mental health.

15. The medical interventions that were promoted to my daughter with a promise that they would relieve her problems, in fact, increased them and led to her death.

16. Parents should not be put in the position to support decisions for their child that can result in infertility or other life-long harms, especially when the young person has mental health issues that are not being addressed.

17. Parents should not be coerced into supporting these decisions through manipulation and threats like the one leveled at me that my daughter would commit suicide if she did not get the intervention she demanded. Most importantly, it will save the lives of vulnerable young people like my daughter.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on June 1, 2023.


Yaakov Sheinfeld